Honorable James L. Robart 2 3 5 6 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 THE HUMAN RIGHTS DEFENSE CENTER and MICHELLE DILLON, No. 2:18-cy-01442-JLR 11 Plaintiffs. JOINT STATUS REPORT AND 12 [PROPOSED] ORDER 13 Noted on Motion Calendar U.S. DEPARTMENT OF HEALTH AND September 10, 2019 14 **HUMAN SERVICES, ADMINISTRATION** FOR CHILDREN AND FAMILIES, and 15 OFFICE OF REFUGEE RESETTLEMENT, 16 Defendants. 17 18 Plaintiffs THE HUMAN RIGHTS DEFENSE CENTER ("HRDC") and 19 MICHELLE DILLON and Defendants U.S. DEPARTMENT OF HEALTH AND HUMAN 20 SERVICES, ADMINISTRATION FOR CHILDREN AND FAMILIES and OFFICE OF 21 REFUGEE RESETTLEMENT hereby provide the Court with a Joint Status Report 22 pursuant to the Court's August 15, 2019 Order (Dkt. No. 35). 23 Since the last Joint Status Report, filed on August 12, 2019, the Defendants have 24 produced parts of spreadsheet summaries of responsive Serious Incident Reports. 25 Defendants have also represented that they believe all spreadsheet summaries of responsive 26 Serious Incident Reports will be produced soon.

JOINT STATUS REPORT AND [PROPOSED] ORDER No. 2:18-cv-01442-JLR – Page 1



1 Since the last Joint Status Report was filed, in house counsel for HRDC left HRDC. 2 HRDC's staff attorney, Masimba Mutamba, intends to appear in this matter pro hac vice. 3 However, Mr. Mutamba's efforts to completely familiarize himself with the issues in this 4 litigation were delayed due to Hurricane Dorian's anticipated impact on the State of 5 Florida, where Mr. Mutamba resides and works. 6 Once Defendants have produced additional spreadsheet summaries of responsive 7 Serious Incident Reports and Mr. Mutamba has familiarized himself with the issues in this 8 litigation, the parties intend to confer regarding whether the underlying documents may still have to be produced. 10 The parties propose a joint status report to be filed on or before October 9, 2019. 11 Dated: September 10, 2019 Respectfully submitted, 12 ARETE LAW GROUP PLLC 13 By: /s/ Jeremy E. Roller 14 Jeremy E. Roller, WSBA No. 32021 1218 Third Avenue, Suite 2100 15 Seattle, WA 98101 Telephone (206) 428-3250 16 Fax (206) 428-3251 iroller@aretelaw.com 17 Attorneys for Plaintiffs The Human Rights 18 Defense Center and Michelle Dillon 19 BRIAN T. MORAN United States Attorney 20 21 By: /s/ Michelle R. Lambert Michelle R. Lambert, NYS # 4666657 22 Assistant United States Attorney United States Attorney's Office 23 700 Stewart Street, Suite 5220 Seattle, WA 98101 24 Telephone (206) 553-7970 Fax (206) 553-4073 25 michelle.lambert@usdoj.gov 26 Attorneys for Defendants

1	EPROPOSED] ORDER	
2	It is hereby ORDERED that:	
3	The parties shall submit a joint status report to the Court on or before October 9,	
4	2019.	
5	y .	
6	Dated this <u>\(\text{\alpha} \)</u> day of September, 2019	
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9	Honorable James L. Robart	
10	United States District Court Judge	
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2	CERTIFICATE OF SERVICE
3	I hereby certify that on this date, I electronically filed the foregoing document with
4	the Clerk of the Court using the CM/ECF system, which will send notification of such filing
5	to the following:
6	MICHELLE R. LAMBERT, NYS #4666657
7	Assistant United States Attorney United States Attorney's Office
ĺ	700 Stewart Street, Suite 5220
8	Seattle, Washington 98101 Phone: (206) 553-7970
9	Fax: (206) 553-4073 Email: michelle.lambert@usdoj.gov
10	·
11	Attorneys for Defendants
12	DATED: September 10, 2019, at Seattle, Washington.
13	Diffed. September 10, 2019, at Beatine, washington.
14	s/ Annabel Barnes Annabel Barnes, Legal Assistant
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